

EXHIBIT B

Robert Wood

From: Buckley, Peter C. [pbuckley@foxrothschild.com]
Sent: Friday, August 02, 2019 11:04 AM
To: Debbie Baugher
Cc: Reed, Eric E.; rwood@rwoodlaw.com
Subject: RE: Confirming Arbitrator - Thrivest Specialty Funding, LLC v. William E. White - Case 01-18-0001-4765
Attachments: 96127718_1_Order 2 - Thrivest Specialty Funding v William E White-C2.PDF

Ms. Baugher,

I write to request that Arbitrator Lesser consider holding the preliminary conference next week, if at all possible. On June 4, 2019, the Emergency Arbitrator in this action entered the attached Interim Award of Emergency Relief, directing Mr. White to escrow \$1.25 million in his attorney's trust account pending resolution of this arbitration on the merits. The Emergency Arbitrator's decision necessarily involved a determination that Thrivest would be irreparably harmed by Mr. White's likely dissipation of the disputed funds absent relief. To date, Mr. White has not complied with the Interim Award. In the absence of compliance with the Interim Award, Thrivest is prejudiced by every passing day and thus my request for an earlier date.

But, it is not just Thrivest that suffers as time goes on. At issue in this arbitration is Mr. White's promise to pay Thrivest the "TSF Distribution" upon receipt of his award in the NFL Concussion Litigation in exchange for a \$500,000 non-recourse advance in 2016. Mr. White received his award, but has refused to honor his promises to Thrivest. According to the schedule agreed to by Mr. White and Thrivest (Ex. B to the Agreement), the TSF Distribution grows each month. As such, Mr. White is prejudiced by the passage of time because it exposes him to the risk of additional financial obligations.

I am available any time next week for the preliminary conference should Arbitrator Lesser decide to grant my request.

Respectfully,

Peter Buckley

Partner

Fox Rothschild LLP

2000 Market Street

20th Floor

Philadelphia, PA 19103-3222

(215) 299-2854 - direct

(215) 299-2150- fax

PCBuckley@foxrothschild.com

www.foxrothschild.com

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